

# EXHIBIT 4

# TRAUB LIEBERMAN

Mid-Westchester Executive Park | 7 Skyline Drive | Hawthorne, NY 10532  
DIRECT (914) 586-7061 | MAIN (914) 347-2600 | FAX (914) 347-7037

Gregory R. Bennett | Partner | gbennett@tlsslaw.com

November 30, 2021

*Via Email Only*

Alexandra Harwin, Esq.  
Kate MacMullin, Esq.  
SANFORD HEISLER SHARP, LLP  
1350 Avenue of the Americas, 31<sup>st</sup> Floor  
New York, NY 10019

Re: *Graham Chase Robinson v. Canal Prods., Inc. et al.*  
Civil Action No.: 19cv9156 (LTS) (KHP)

Dear Ali and Kate:

We are writing in response to your November 16, 2021 letter concerning the Defendants' privilege logs, and as a follow-up to our November 23 meet and confer discussion concerning that issue, among multiple others.

As a supplement to the information contained in Defendants' Privilege Logs (Nos. 1-3), Defendants hereby provide additional information to Plaintiff concerning the general subject matter for each of the categories referred to therein:

*Log 1:*

- Category 1: Communications, including attached documents, relating to transactions involving the prospective assessment and/or actual provision of acting, performance and/or related forms of services offered by Defendant Robert De Niro, through Canal Productions, Inc. ("Canal");
- Category 2: Communications, including attached documents, relating to Plaintiff's departure from Canal and/or issues identified in Canal's state court action against Plaintiff;
- Category 3: Communications, including attached documents, relating to various general legal issues concerning either or both Defendants, generally unrelated to the dispute encompassed by the pending action (including the Counterclaims);
- Category 4: Communications, including attached documents, relating to insurance coverage issues relating to Plaintiff's federal action against Defendants;

Alexandra Harwin, Esq.  
Kate MacMullin, Esq.  
November 30, 2021  
Page 2

- Category 5: Communications, including attached documents, relating to (and following) Canal's commencement of state court action against Plaintiff and Plaintiff's commencement of the instant action against Defendants; and
- Category 6: Communications involving legal counsel, investigators and/or external Canal consultants, some of which include Plaintiff before her resignation, bearing upon issues identified by Plaintiff's allegations and/or legal claims in the instant action. Examples include, but are not limited to, communications involving Plaintiff and Canal's external legal counsel regarding wage/hour issues within Canal during Plaintiff's employment with Canal.

*Log 2:*

- Category 1: The description provided above for Category 1 applies to this category equally;
- Category 2: The description provided above for Category 2 applies to this category equally;
- Category 3: The description provided above for Category 3 applies to this category equally;
- Category 4: Communications, including attached documents, relating to (and following) Canal's commencement of state court action against Plaintiff and Plaintiff's commencement of the instant action against Defendants; and
- Category 5: Communications, including attached documents, relating to various family law issues involving Mr. De Niro, his family law legal counsel, family members, various former or current Canal personnel and/or external consultants and others relating to issues not material to this action (including the Counterclaims).

*Log 3:*

- Category 1: The description provided above for Category 2 in Log 1 applies to this category equally;
- Category 2: The description provided above for Category 5 in Log 1 applies to this category equally;
- Category 3: The description provided above for Category 3 in Log 1 applies to this category equally; and
- Category 4: The description provided above for Category 5 in Log 2 applies to this category equally.

Alexandra Harwin, Esq.  
Kate MacMullin, Esq.  
November 30, 2021  
Page 3

As we also agreed during the November 23 meet and confer, Defendants shall promptly conduct a supplemental review of all responsive documents they have not produced based on any of the above designations, and (i) notify Plaintiff if particular communications do not include an attorney or personnel from an attorney's office as a sender/recipient thereon, and (ii) to the extent Defendants identify any documents responsive to Plaintiff's discovery demands which may have been withheld inadvertently based on a ground(s) identified in Logs 1-3, they shall produce any such document. Defendants will provide information to Plaintiff regarding the foregoing issues by December 3, 2021.

Please contact us if you have any questions.

Sincerely,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

*Gregory R. Bennett*

Gregory R. Bennett

cc: All Counsel (via email only)